

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROLANDO JESSE DAZA-CORTEZ,

Defendant-Petitioner,

v.

UNITED STATES OF AMERICA,

Plaintiff-Respondent.

NO. C18-1608RAJ
(CR15-269RAJ)

UNITED STATES' ANSWER TO
AMENDED PETITION FILED
UNDER 28 U.S.C. § 2255
("PETITIONER'S RESPONSE TO
GOVERNMENT'S RESPONSE")

Exhibit 16

Notes from Prior Counsel Emily Gause

March 7, 2017

Meeting with Roland

3/7/17

Discussed DV incidents for Fernando -- R.B.L. (4) incidents

Fernando does not speak english -- how is he able to text with the agent. Did he have help with texting? He must have. Who helped him??

Provide Stephan a copy of Barricks report.

Sarah showed a note to Miguel about the liquor board license.

Need to reengage Lorraine for trial --

Think about bifurcating or dismissing the Avocados forfeiture

Can we move to dismiss Avocados as a forfeiture --

Roland does not want to go to trial

He wants 5-7 years, or agreed 6 or agreed 7, or even 5-8.

He wants me to really push on renegotiating.

Roland was never arrested in the Tacoma case -- they say he was

** Greg to give us reports ASAP